

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

IN RE: ) BANKRUPTCY CASE  
 )  
MICHAEL ANDERSON, JR., ) NO.: 17-27740  
 )  
Debtor, ) CHAPTER 13  
 )  
 ) JUDGE: TIMOTHY A. BARNES  
 )

**NOTICE OF MOTION**

TO: SEE ATTACHED ADDRESSES

PLEASE TAKE NOTICE THAT ON February 15, 2018 at 09:30 am, or as soon thereafter as counsel may be heard, I shall appear before the Honorable Timothy A. Barnes, U.S. Bankruptcy Judge, 219 S. Dearborn St., Chicago, Illinois 60604, room 744, and shall then and there present the attached Motion and at which time you may appear if you so desire.

**CERTIFICATION**

I, the undersigned Attorney, Certify that I served a copy of this Notice to the Addresses attached by electronic notice through ECF or by depositing the same at the U.S. Mail at 1 North Dearborn, Chicago, Illinois 60602 at 5:00 P.M. on February 1, 2018, with proper postage prepaid.

McCalla Raymer Leibert  
Pierce, LLC

Kinnera Bhoopal  
/s/Kinnera Bhoopal  
ARDC# 6295897

1 N. Dearborn Suite 1200  
Chicago, IL 60602  
(312) 346-9088

**Pierce & Associates, P.C. and McCalla Raymer, LLC combined Firms to form the  
Firm McCalla Raymer Pierce, LLC.**

**This is an attempt to collect a debt and any information obtained will be used for  
that purpose.**

**NOTICE OF MOTION ADDRESSES**

To Trustee:  
Marilyn O. Marshall  
224 South Michigan  
Suite 800  
Chicago, IL 60604

*by Electronic Notice through ECF*

To Debtor:  
Michael Anderson, Jr.  
2607 E 83RD ST  
Chicago, IL 60617

*Served via U.S. Mail*

To Attorney:  
Brian I Atlas, Esq.  
The Semrad Law Firm, LLC  
20 S. Clark St, 28th Floor  
Chicago, IL 60603

*by Electronic Notice through ECF*

McCalla Raymer Leibert Pierce, LLC  
Attorney For: Creditor  
1 N. Dearborn Suite 1200  
Chicago, IL 60602  
(312) 346-9088  
File No. BK-005375-17

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**MOTION TO MODIFY THE AUTOMATIC STAY**

NOW COMES Seterus, Inc., as authorized subservicer for Federal National Mortgage Association ("Fannie Mae"), a corporation organized and existing under the laws of the United States of America by and through its attorneys, McCalla Raymer Leibert Pierce, LLC, and requests that the Automatic Stay heretofore entered on the property located at 2607 E 83th St, Chicago, Illinois 60617 be Modified stating as follows:

1. On September 15, 2017, the above captioned Chapter 13 was filed.
2. On December 14, 2017, the above captioned Chapter 13 was confirmed.
3. Seterus, Inc., as authorized subservicer for Fannie Mae services the first mortgage lien on the property located at 2607 E 83th St, Chicago, Illinois 60617.
4. The Plan calls for the Debtor to be the disbursing agent for the post-petition mortgage payments directly to Seterus, Inc., as authorized subservicer for Fannie Mae. Post-petition payments are \$989.74.
5. The post-petition mortgage payments are due and owing for October 01, 2017. The default to Seterus, Inc., as authorized subservicer for Fannie Mae is approximately \$4,689.96 through January 2018, including attorney's fees and costs of this motion.
6. The plan is in material default.

7. Seterus, Inc., as authorized subservicer for Fannie Mae continues to be injured each day it remains bound by the Automatic Stay.
8. Seterus, Inc., as authorized subservicer for Fannie Mae is not adequately protected.
9. The property located at 2607 E 83th St, Chicago, Illinois 60617 is not necessary for the Debtor's reorganization.
10. The Debtor has no equity in the property for the benefit of unsecured creditors. No cause exists to delay the enforcement and implementation of relief and Bankruptcy Rule 4001(A)(3) should be waived.

WHEREFORE, YOUR MOVANT respectfully prays that the Automatic Stay on the property located at 2607 E 83th St, Chicago, Illinois 60617, be modified, and that Bankruptcy Rule 4001(a)(3) be waived as not applicable, and leave be granted to Seterus, Inc., as authorized subservicer for Fannie Mae to proceed with foreclosure, and for such other and further relief as this Honorable Court deems just.

McCalla Raymer Leibert Pierce, LLC

By: /s/Kinnera Bhoopal  
Kinnera Bhoopal  
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